

DSJ1&2-PR Exh 564

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
1	Diversion Control	People	There are inconsistencies with respect to who is reviewing and adjudicating orders held by the OMP at the distribution center. At some facilities, it is the warehouse managers and supervisors, at others it is the cage and vault clerks or the compliance clerks and at others it is the data process team.	-Regulatory obligations related to diversion control -Inconsistencies in the treatment of orders held for review -Inability to support decisions upon third party inquiry	Yellow	Identify dedicated resource(s) and alternatives at the distribution center to be trained on the OMP. Ensure they have received the training and reference guides developed by the corporate team. In theory, the first-line reviewers should not be within CSRA because they are responsible for auditing the process. Ultimately this responsibility should fall to a salaried employee due to the importance of the function.
Assigned to:			David May			

RANKING:

 Group A, Can be addressed Operationally

Select Priority: High Medium Low X NA

Select Category: Must Do Like to Do Do Not Need to Do

 Group B, Requires an IT Solution

Select Priority: High Medium Low X NA

Select Category: Must Do Like to Do Do Not Need to Do

DISCUSSION NOTES:

1. NO FURTHER ACTION REQUIRED - Consistency is found in the training and process; a dedicated resource is not necessary.

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2	Diversion Control	Processes	There is currently a lack of visibility to the process and rationale for adjudicating orders held for review. While both the corporate and distribution center personnel reviewing orders provide comments, there is no standard set of defined reasons to support those decisions.	-Regulatory obligations related to diversion control -Inconsistencies in the treatment of orders held for review -Inability to support decisions upon third party inquiry	Yellow	The Diversion Control Team is currently working to standardize the processes and protocols for evaluating and documenting the decision rationale in order to drive consistency and transparency at both the corporate and distribution center level reviews. Continue to develop additional training and guidance regarding the order adjudication process.
Assigned to:			David May			

RANKING:

☐ **Group A, Can be addressed Operationally**

Select Priority: ☐ High ☐ Medium ☐ Low ☒ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☐ **Group B, Requires an IT Solution**

Select Priority: ☐ High ☐ Medium ☐ Low ☒ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

NOTES:

1. **NO FURTHER ACTION REQUIRED** - There is complete visibility in the process, training and rationale. Training is in place; further documentation exists within the Policies & Procedures.
2. CSRA recommendation – develop a more robust messaging system for the customer, that would support decisions made regarding OMP.
3. CSRA has identified enhancements to SAP that would also benefit customer support.

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3	Diversion Control	Systems	<p>There is no coordination of order monitoring between ABDC and ABSG. This presents the risk that a customer terminated by ABDC could continue to be serviced by ABSG, which has happened.</p> <p>Further for ABSG, there is no electronic monitoring of orders, all communications related to OMP matters are through email and any held orders must be approved by Frisco in order to fill. The OMP is a very manual process and the only record of OMP reviews by ABSG is the email from the location identifying any suspicious orders to the corporate business unit.</p>	<p>–Regulatory obligations related to diversion control</p> <p>–Inconsistencies in the treatment of orders held for review</p> <p>–Inability to confirm that activities are compliant with agreed upon standards and protocols</p>	Red	<p>Although the volume of controlled substances handled by ABSG facilities is relatively low, the risks associated with the monitoring of controlled substances and reporting of suspicious orders are particularly high.</p> <p>Formalize and memorialize the OMP for the other business units. Improve communications and information sharing between the business units distributing controlled substances. Develop Master Customer Maintenance files that are common to all business units and locations.</p>
Assigned to:			David May			

RANKING:**___ Group A, Can be addressed Operationally**

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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4	Regulatory Oversight – Audits	Systems	Audit checklists are completed on paper, risk values and reports are manually developed so there is limited electronic evidence of the audit. Audit results – scores, findings, issues –are tracked manually in spreadsheets. In addition to being an inefficient way to manage the audit process, this makes it difficult to identify trends and risk areas that need to be address.	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality – Compromises the ability to collect relevant data and information –Inability to confirm that audits are complying with agreed upon standards and protocols	Yellow	Create an electronic version of the audit checklists within the matter management solution that will capture the audit findings, calculate risk values and generate dashboards and reports. This will improve efficiencies while eliminating the manual tracking and double recording of audit findings. Utilizing an electronic checklist would also allow improvements to the reporting and tracking of audits: –reducing the time and effort to manually prepare multiple iterations of the audit report by establishing templates that are fed by data responsive to the checklists – to the facilities through a recap report, regional leadership through the preliminary report and management via the final report; –trending data in order to share insights gained from the audits to all locations including the problem areas, practices shown to be effective in addressing those areas and positive compliance results; –establishing controls to confirm that audit protocols are completed according to defined standards and results are being reviewed regularly by leadership.
Assigned to:			Mays			

RANKING:

 Group A, Can be addressed Operationally

Select Priority: High Medium Low NA

Select Category: Must Do Like to Do Do Not Need to Do

XXX **Group B, Requires an IT Solution**

Select Priority: High XXX Medium Low NA

Select Category: XXX Must Do Like to Do Do Not Need to Do

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ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
5	Regulatory Oversight – Audits	Processes	Audits are inefficient and there's a lot of administrative work associated with the audits that CSRA must complete. It is a time consuming process to gather the required information, such as historical audit reports and training records, during the pre-audit. The on-site audit takes 30-40 hours to complete, plus there is additional time required to assign risk values and transcribe the notes into an audit report. The entire process through to final reports generally takes 6-8 weeks.	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality	Green	Having access to items required for the pre-audit and audit through a Matter Management Solution would increase efficiencies and reduce the time needed to be spent on-site as documentation such as previous audits or safety checklists could be reviewed remotely by the auditor.
Assigned to:			Mays			

RANKING:

 Group A, Can be addressed Operationally

Select Priority: High Medium Low NA

Select Category: Must Do Like to Do Do Not Need to Do

XXX Group B, Requires an IT Solution

Select Priority: High **XXX** Medium Low NA

Select Category: Must Do **XXX** Like to Do Do Not Need to Do

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6	Regulatory Oversight – Audits	Processes	CSRA does not have different checklists for the ABSG business units. The auditors just “skip over” the questions that are not applicable, but do not supplement the checklists for requirements that are unique to those business units even though there are fundamental differences in the business operations. For example, there are regulatory obligations associated with the relabeling that occurs at ICS that should be assessed as part of a Security & Regulatory Compliance audit.	–Lack of visibility to issues or incidents not captured	Red	Create an audit checklist and program specific to each business unit and train the auditors on the procedures, risks and controls.
Assigned to:			Mays/Ross			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: XXX High ___ Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

XXX Group B, Requires an IT Solution

Select Priority: ___ XXX ___ High ___ Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

NOTES: This one is both an operational and IT solution.

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7	Regulatory Oversight – Audits	Processes	Facilities are required to complete self-audits, but there is a lack of guidance around the self-audit requirements and protocols. In addition, there is no template for reporting results to their Regional Director as instead the Compliance Managers just provide their own narratives. Finally, the self-audits are completed manually so can be quite time consuming and there is no electronic evidence of the audit.	<ul style="list-style-type: none"> –Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality –Inability to confirm that activities are compliant with agreed upon standards and protocols –Inconsistent reporting of results can cause oversight to potential issues 	Green	<p>Inventory and evaluate the tools and reports currently used by the local teams. Establish a CSRA policy to provide more formalized and consistent guidance related to self-audits, including the frequency for completing self-audits, the protocols for conducting self-audits and the requirements for reporting and certifying the results of self-audits.</p> <p>Incorporate the standard protocols into a matter management system that can track self-audit findings and generate audit reports, results and scores.</p>
Assigned to:			Mays			

Comment [CZ1]: This portion is operational???

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: XXX High ___ Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

XXX Group B, Requires an IT Solution

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

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8	Regulatory Oversight – Compliance	Processes	There are inconsistencies between distribution centers in the processes for completing required activities. These are exacerbated because there is limited interaction between distribution centers or across regions. In addition, there are inconsistencies in how the facilities access and consume information to support their compliance activities. For example, inventory adjustment reports can be customized so currently look different for different distribution centers which could lead to inconsistent application of review standards.	<ul style="list-style-type: none"> –Inconsistencies in executing established processes –No regularized review of what works and what doesn't in order to drive best practices 	Green	Inventory and evaluate the tools and reports currently used by the corporate and local staff and facilitate better collaboration and communication between distribution centers to identify and implement best practices.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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9	Regulatory Oversight – Compliance	Systems	<p>Compliance training is a manual effort and seems inefficient. Training is conducted through in-person presentations, though there are inconsistencies in who delivers the training. The tracking and reporting of training records and completion rates is done manually via spreadsheet.</p> <p>For example, some Compliance Managers are holding weekly trainings for new associates, and even then may have to conduct additional sessions during the week. The in-person training takes multiple hours to conduct and also involves 20 page paper tests that need to be manually completed and scored.</p> <p>Turnover at the warehouse also makes training more of a major challenge as there is an increased need to train additional associates.</p>	<p>–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality</p> <p>–Lack of visibility to associate compliance and no regularized review to drive best practices</p>	Yellow	<p>Leverage the Training Committee in order to review current training content and practices and evaluate whether existing online learning platforms can be leveraged to administer, track and report on required compliance training activities as part of the hiring and on-boarding process managed by Human Resources.</p> <p>At a minimum, create a centralized electronic database or system for tracking and reporting associate status and compliance with training requirements.</p> <p>Define and enforce remedial action steps if a worker does not fulfill their training requirements and/or does not complete mandatory training in the required timeframe.</p>
Assigned to:			Mays			

RANKING:**XXX Group A, Can be addressed Operationally**Select Priority: ___ High XXX Medium ___ Low ___ NASelect Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do**XXX Group B, Requires an IT Solution**Select Priority: ___ High XXX Medium ___ Low ___ NASelect Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do**NOTES:**

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10	Regulatory Oversight – Compliance	People	<p>CSRA team members sometimes assume responsibilities that are not "compliance related" because they feel compliance has the most at stake (since CSRA is responsible for maintaining the facility licenses and reporting losses to the DEA) and believe they are best suited to ensure things are done correctly. For example, certain customer claims related to shortages should be investigated by the Inventory Manager in the first instance because they would have more direct access to receiving and inventory records.</p> <p>Having the Compliance Managers report into CSRA instead of Operations has helped to reduce the operational tasks that Compliance Managers and Clerks are asked to perform, but there is some lingering confusion about the roles and responsibilities of the Compliance Manager at the distribution center.</p>	<p>–Ineffective alignment and allocation of resources and expertise</p> <p>–Opportunity for things to fall through the cracks if responsibilities are not clearly defined</p> <p>–Difficult to drive consistencies when governance and processes are not well established</p> <p>–No regularized review of what works and what doesn't in order to drive best practices</p>	Green/Yellow	<p>Develop master list of responsibilities for the Compliance Managers and Clerks, including tactical guidance for completing activities that need to be performed on a daily, weekly, monthly, annual basis and levels of authority and autonomy for making decisions.</p> <p>It is also important to ensure that Compliance Managers are not auditing their own areas of responsibility so CSRA should work with Operations in defining those responsibilities.</p> <p>Work with Operations to change the mentality that anything "controlled" is the responsibility of CSRA and instead encourage associates to focus on the nature of the question or issue to determine who is best to address the request.</p>
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: XXX High ___ Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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11	Regulatory Oversight – Compliance	People	The consolidation of the VP and Operations and the Operations Manager roles into the Director of Operations function also had a downstream impact on compliance. In addition to the loss of a resource at the facility that had involvement in compliance-related activities, the Directors of Operations have a lot of responsibilities (including picking, packing and shipping) so do not have as much time to focus on compliance.	–Ineffective alignment and allocation of resources and expertise –Inefficient utilization of time and resources and potential for duplication of efforts	Green	Work with Operations to define the roles and responsibilities of the Compliance Managers and the Directors of Operations, including their obligations as it relates to compliance activities at the facilities.
Assigned to:						

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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12	Regulatory Oversight – Compliance	People	Centralization of Customer Care presented certain challenges because the associates are not as knowledgeable about the customers or their issues. For example, when a customer calls in a claim for product shortage, the Customer Care Associate may not ask all of the necessary questions to collect the relevant information. As a result, the Compliance Managers have had to assume certain responsibilities and activities that used to fall to the local customer representatives.	--Ineffective alignment and allocation of resources and expertise --Inefficient utilization of time and resources and potential for duplication of efforts	Green	Provide additional training and guidance to Customer Care associates, and ensure that they are re-educated when there are procedural changes that may impact customers. For example, develop a checklist of questions to ask when following up on a customer claim alleging product loss. Consider whether to have Customer Care associates that are dedicated to handling controlled substance inquiries.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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13	Regulatory Oversight – Compliance	People	Centralization of the Human Resources function has made certain activities, such as onboarding new associates and pulling associate records, more challenging than when the function existed at the distribution center. For example, when requesting associate files to support an audit or investigation, it can take a long time to receive requested information and often not all of the requisite information is provided in the first instance.	<ul style="list-style-type: none"> –Ineffective alignment and allocation of resources and expertise –Inefficient utilization of time and resources and potential for duplication of efforts 	Green	Provide additional training and guidance to Human Resources associates, and ensure that they are re-educated when there are procedural changes that may impact associate tracking. For example, develop a checklist of documents to provide when a personnel file is requested.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
14	Regulatory Oversight – Compliance	People	Centralization of the Transportation function has also presented challenges. The Transportation Managers are often not responsive to inquiries, leaving the Compliance Managers to assume the responsibilities that used to belong to the local transportation associates particularly as it relates to investigations. On the flip side, Transportation Managers sometimes do not understand how and when to notify CSRA when there is a suspected loss of controlled substances.	<ul style="list-style-type: none"> –Ineffective alignment and allocation of resources and expertise –Inefficient utilization of time and resources and potential for duplication of efforts 	Green	Provide additional training and guidance to Transportation Managers regarding their role and responsibilities related to investigations and other compliance activities, including guidance on who to contact and what information to provide.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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15	Regulatory Oversight – Compliance	Processes	Many deficiencies may be due to process short-cuts taken at the distribution centers by associates trying to achieve certain performance targets and quotas. There are competing interests as CSRA is responsible for compliance and safety at the distribution centers but Operations, which is focused on speed and efficiency in picking, packing and shipping, designs the incentive programs.	<ul style="list-style-type: none"> –Conflicting priorities could result in additional risk –Limits ability to head off issues that may present compliance challenges –Quality assurance may be jeopardized 	Yellow	Review the associate incentive and award programs at the distribution centers to ensure the goals align with the organizational goals and compliance-related requirements. Coordinate with Operations in terms of assessing the business and service level impacts of any changes that are made to incentive programs.
Assigned to:			Mays			

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Comment [CZ2]: Not sure this is an issue, see Notes below

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NASelect Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES: I am not sure this is an issue. CSRA has its interest to ensure compliance and Operations has its goal to efficient. CSRA's incentive Plan has nothing to do with Operations efficiency.

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16	Regulatory Oversight – Compliance	Processes	CSRA is often not consulted or involved in organizational initiatives or business strategy discussions until late in the cycle of projects, making it appear that compliance is sometimes an afterthought. For example, the centralization of certain support services such as Customer Care and Human Resources did not seem to contemplate the downstream impact on compliance (e.g., local knowledge of the associates and delayed delivery of requested materials and information).	--Limits ability to head off issues that may present compliance challenges	Yellow	Need better processes and governance around the rules of engagement with CSRA – when and how to include CSRA in the conversation. For example, CSRA should be involved in initial playbook meetings to understand and evaluate any potential compliance considerations and determine whether CSRA should be part of the project team.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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17	Regulatory Oversight – Compliance	Processes	There is a general impression within CSRA that any "significant information" needs to be documented and tracked, but no clear guidance on what this means or how to do so.	--Lack of visibility to issues or incidents not captured	Red	<p>Policies, procedures and guidelines regarding tracking and documenting issues and activities</p> <p>Distribution Center Compliance Managers need to have controlled access to any matter management system so that they can enter information that can be reviewed by corporate. For example, there can sometimes be hundreds of emails going back and forth regarding an investigation.</p>
Assigned to:			Mays			

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Comment [C23]: I believe this is an operation issue as well. I thought we had P&Ps about documentation???

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: XXX High ___ Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

XXX Group B, Requires an IT Solution

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

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18	Regulatory Oversight – Compliance	Systems	There are many forms and checklists that have to be completed at the distribution center. Currently, most are completed manually and paper copies are stored at the location. While certain information will continue to need to be tracked manually (e.g., DEA Form 222s), other documents could be transitioned to electronic form (e.g., safety checklists).	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality	Green	Inventory and evaluate all of the paper documentation completed by CSRA personnel to determine which forms and checklists can be transitioned to electronic templates. Compliance Managers are mobile, as certain duties require them to walk around the warehouse facility. Consider providing Compliance Managers with iPads or tablets so that information can be collected contemporaneously and electronically written to a database for access and reporting.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

XXX Group B, Requires an IT Solution

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

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Comment [CZ4]: Operation function as well

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19	Regulatory Oversight – Compliance	Processes	There are no uniform reporting tools or templates within CSRA or governance around what needs to be reported to whom. For example, the Distribution Center Compliance Managers have developed their own tracking spreadsheets to manage and monitor regulatory compliance activities, such as DEA submissions, inventory adjustments, monitoring tasks, associate training and facility licensure.	–Inconsistencies in executing established processes –No regularized review of what works and what doesn't in order to drive best practices	Yellow	Inventory and evaluate the tools and reports currently used by CSRA personnel. Evaluate what information can be standardized across locations and what can be variable. Where applicable, develop a more formalized and consistent protocol through which information and results are centrally collected, reported and certified to.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

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20	Regulatory Oversight – Compliance	Processes	CSRA is responsible for maintaining the facility licenses (DEA, State Boards of Pharmacy, etc.), but currently tracks all licenses and related requirements on spreadsheets. The license is what allows the location to do business so the lack of controls around this process presents a significant risk to the organization.	--Allowing a license to expire or not understanding changes to the requirements risks shutting down the facility	Red	Maintain and monitor facility licenses through an electronic system that triggers alerts when licenses need to be renewed and references the regulatory requirements associated with that particular license.
Assigned to:			Mays			

RANKING:

 Group A, Can be addressed Operationally

Select Priority: High Medium Low NA

Select Category: Must Do Like to Do Do Not Need to Do

XXX Group B, Requires an IT Solution

Select Priority: XXX High Medium Low NA

Select Category: XXX Must Do Like to Do Do Not Need to Do

NOTES:

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21	Regulatory Oversight – Compliance	Processes	CSRA has experienced challenges in maintaining the state regulatory matrix, which tracks licensure, reporting and other miscellaneous requirements and is currently housed in a spreadsheet and periodically updated through manual review. Currently, CSRA resources are responsible for updating the matrix but may not have the necessary access to information or expertise to interpret regulatory obligations and requirements. For example, a Compliance Manager may reach out to their state representative to inquire about state requirements and either not receive a response or receive incorrect information.	<ul style="list-style-type: none"> Not clear who is responsible for maintaining requirements Lack of compliance with state or federal requirements Ineffective alignment and allocation of resources and expertise 	Red	First, establish who is responsible for maintaining the matrix. CSRA should determine whether should be support or coordination with Legal or other departments and then task specific parties with continual maintenance of the matrix. Second, establish an electronic version in a centralized location where requirements can be monitored, updated and accessed as appropriate, using a repeatable process and ensuring visibility to any changes that are made.
Assigned to:			Mays			

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Comment [CZ5]: Operational as well

RANKING:

XXX Group A, Can be addressed OperationallySelect Priority: XXX High ___ Medium ___ Low ___ NASelect Category: XXX Must Do ___ Like to Do ___ Do Not Need to DoXXX Group B, Requires an IT SolutionSelect Priority: XXX High ___ Medium ___ Low ___ NASelect Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

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22	Regulatory Oversight – Compliance	Processes	Notifications of employee terminations from Human Resources shared services function are not distributed to all relevant parties. Specifically, the Compliance Managers are not on the email distribution so may be delayed in receiving notification of terminations even though they are responsible for building security and badge access.	--Terminated employee with access to the facility presents a risk for theft or violence	Red	Include Compliance Managers on the terminations distribution list and explore better coordination with Human Resources to mitigate the risk associated with terminations.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: XXX High ___ Medium ___ Low ___ NA

Select Category: XXX Must Do ___ Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
23	Regulatory Oversight – Compliance	Processes	There is no clear guidance with respect to how CSRA is supposed to engage in customer communications. As a general rule, the Compliance Managers are not supposed to reach out to customers – communications are supposed to go through either Customer Care or the business leadership (in the case of ABSG). However, some facilities contact the customers directly because it is more efficient than working through Customer Care or corporate resources which can lead to inconsistent messaging to customers.	–Difficult to implement sustained infrastructure and other process improvements –Prevent resources from focusing on assigned projects and ensuring compliance	Yellow	Provide better definition around the roles of engaging with customers. Customer Care associates are trained to deal with customers so should be handling those communications, but need to be better trained on the questions to ask and the information to collect when outreaching on behalf of CSRA. Consider whether to have Customer Care associates that are dedicated to handling controlled substance inquiries.
Assigned to:			Mays			

RANKING:

XXX Group A, Can be addressed Operationally

Select Priority: ___ High XXX Medium ___ Low ___ NA

Select Category: ___ Must Do XXX Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
24	Investigations	Systems	<p>Investigations are currently tracked in RMS. However, the system does not provide the necessary functionality to meet the needs of the CSRA Investigations team. Specific deficiencies of the system include, but are not limited to, the following:</p> <ul style="list-style-type: none"> --Compliance Managers do not have access to open a matter or enter information relevant to the matter. --Unable to add supplemental information to closed investigations in RMS. The investigator either has to reopen a closed investigation and resubmit it for closure or create a new matter to track the additional information. --RMS does not allow for the linking of related matters. --There is limited information that can be entered for a matter. For example, only one product can be designated on the matter so the investigator would have to create separate matters if there were multiple products impacted by a theft. --Cannot reach broadly across all active and historical investigations and related CSRA matters. --Reporting is limited, which reduces visibility to potential trends and issues. 	<ul style="list-style-type: none"> --Ineffective utilization of time and resources -- reduced productivity, reduced efficiency, reduced quality --Incomplete or inaccurate information recorded in the system --Lack of visibility to historical or related information that may impact the investigation 	Red	<p>Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team. Include in the system requirements any required or desired functionality that is not available in the current system.</p> <p>For example, provide a user-friendly online, generic form that is accessible to all CSRA resources (e.g., the Compliance Managers), to open a matter and route it for investigators.</p>
Assigned to:			Bruce Gundy			

RANKING:

☐ **Group A, Can be addressed Operationally**

Select Priority: ☐ High ☐ Medium ☐ Low ☐ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ **Group B, Requires an IT Solution**

Select Priority: ☒ High ☐ Medium ☐ Low ☐ NA

Select Category: ☒ Must Do ☐ Like to Do ☐ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
25	Investigations	Systems	Investigations activities, status and results are manually tracked through Excel spreadsheets. As a result, there is limited aggregate reporting which prevents management from having visibility to potential trends and issues.	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality –Lack of visibility to potential risks and concerns	Green	Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team. Include in the system requirements any required or desired functionality that is not available in the current system, including automated routine and ad hoc reporting.
Assigned to:			Bruce Gundy			

RANKING:

☐ Group A, Can be addressed Operationally

Select Priority: ☐ High ☐ Medium ☐ Low ☐ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ Group B, Requires an IT Solution

Select Priority: ☐ High ☒ Medium ☐ Low ☐ NA

Select Category: ☐ Must Do ☒ Like to Do ☐ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
26	Investigations	People	The roles and responsibilities as it relates to investigations are not clearly defined. Notifications of customer claims are distributed to a group that includes both the corporate and local CSRA teams, as well as the Director of Operations. As a result, there are inconsistencies with respect to who handles the investigatory activities, which in different instances can be the Corporate Investigators, Compliance Managers, Warehouse Managers, Inventory Control Managers and/or Transportation Managers.	<ul style="list-style-type: none"> –Difficult to implement sustained infrastructure and other process improvements –Prevents resources from focusing on assigned projects and ensuring compliance –Ineffective alignment and allocation of resources and expertise 	Green/Yellow	<p>Clearly define the roles and responsibilities related to claims and investigations. Develop formal training and guidelines for personnel involved in any investigatory activities.</p> <p>For example, the Quick Incident Checklist is a good reference tool with respect to the information that is required to be collected for certain types of investigations, but should be expanded to address all types of investigations.</p>
Assigned to:			Bruce Gundy			

RANKING:

 Group A, Can be addressed Operationally

Select Priority: High Medium Low NA

Select Category: Must Do Like to Do X Do Not Need to Do

 Group B, Requires an IT Solution

Select Priority: High Medium Low NA

Select Category: Must Do Like to Do Do Not Need to Do

NOTES:

1. Investigations disagrees with these findings, as claims and the claims process are not handled by Investigations.
2. If the findings relate to Diversion, a matter is opened in RMS.

Highlighted area – discussion needed:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
27	Investigations	Processes	There are no clear guidelines on when to open a formal matter for potential incidents. It is subject to a subjective "reasonable person standard." For example, if a product loss is quickly resolved it will not be tracked. As a result, there is no complete inventory of incidents or depiction of CSRA activities.	—Incomplete or potential for inaccurate information and reporting.	Yellow	Clearly define which incidents should be formally tracked as "matters," and whether any specific types of incidents may be handled and resolved at the facility versus required to be reported up to corporate. The general sentiment is that "losses get reported to Corporate Investigators when they cannot be resolved by the distribution center." Consider implementing a "quick incident log" to record any claims or incidents that are quickly resolved by the facility.
Assigned to:			Bruce Gundy			

RANKING:

X Group A, Can be addressed Operationally

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

X Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium **_X_** Low ___ NA

Select Category: ___ Must Do **_X_** Like to Do ___ Do Not Need to Do

NOTES:

Highlighted area – discussion needed.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
28	Investigations	Processes	<p>There are no clear guidelines for when to close a matter, which may result in matters remaining open when they are not actively being worked by CSRA.</p> <p>For example, an investigation will remain open when the incident has been handed off to external law enforcement until a resolution is provided or no further updates are forthcoming. Similarly, an investigation may lag while CSRA is awaiting responses or information from other ABC Departments (e.g., Operations or Transportation). Or after an investigation has been resolved, the matter might remain open for a few weeks of "monitoring" to ensure there are no additional or resulting concerns.</p>	<p>–Investigations stay open for longer than necessary</p> <p>–Incomplete or potential for inaccurate information and reporting</p> <p>–Lack of visibility to resource allocation and workload</p>	Green	Create additional status categories to understand where in the lifecycle the investigation stands and whether it remains in the purview of CSRA. Also include in the system requirements the need for triggers or alerts that remind the CSRA investigator to follow-up on open investigations that they are not actively working on a periodic basis. With respect to internal communications, provide expected response times to business partners from which information is being requested.
Assigned to:			Bruce Gundy			

RANKING:

X Group A, Can be addressed Operationally

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

X Group B, Requires an IT Solution

Select Priority: ___ High _X_ Medium ___ Low ___ NA

Select Category: _X_ Must Do _X_ Like to Do ___ Do Not Need to Do

NOTES:

Highlighted area – discussion needed.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
29	Investigations	Processes	Investigation results are manually tracked and reported. There is a general report template that has been adopted by the team (i.e., Summary statement, Investigation updates, Matter resolution, Closing statement), but it is written in a Word document which causes inefficiencies and inconsistencies.	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality –Inconsistencies in executing established processes –Lack of visibility to issues that may present risk to the organization	Green	Inventory and evaluate the tools and reports currently used by the team members. Develop a more formalized consistent protocol, reporting elements and templates that are adopted by all team members. Establish and memorialize escalation procedures for reporting issues to management and/or external agencies.
Assigned to:			Bruce Gundy			

RANKING:

 X Group A, Can be addressed Operationally

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

 X Group B, Requires an IT Solution

Select Priority: ___ High X Medium ___ Low ___ NA

Select Category: ___ Must Do X Like to Do ___ Do Not Need to Do

NOTES:

Highlighted area – discussion needed.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
30	Investigations	Systems	CSRA resources manage and track all other assigned tasks and activities through email and spreadsheets (e.g., pharmacy visits, workplace violence incidents, employee termination meetings, etc.).	<ul style="list-style-type: none"> –Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality –Inconsistencies in executing established processes –Lack of visibility to resource allocation and workload 	Green	Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team.
Assigned to:			Bruce Gundy			

RANKING:

☐ Group A, Can be addressed Operationally

Select Priority: ☐ High ☐ Medium ☐ Low ☐ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ Group B, Requires an IT Solution

Select Priority: ☐ High ☒ Medium ☐ Low ☐ NA

Select Category: ☒ Must Do ☐ Like to Do ☐ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
31	Compliance Complaints (Network Calls)	Processes	There is limited guidance around the handling of Network Calls and the institutional knowledge resides with a single resource that manages the process.	-Inconsistencies in executing established processes	Yellow	Establish specific guidance regarding the processes for handling Network Calls, including how issues are categorized and prioritized, who is responsible for investigating the allegation, and when a resolution needs to be provided.
Assigned to:			Bob Crow			

RANKING:

X Group A, Can be addressed Operationally

Select Priority: ___ High ___ Medium ☒ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ☒ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low ☒ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES:

-I feel we have appropriate back-ups that understand the process. Bruce Gundy, Director of Investigations and Julie Hinman, Manager – CSRA.

-I feel adequate guidance, including categorizing and resolution, exists within Policy and Procedure for handling and processing of Compliance Complaints (Network Calls).

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
32	Compliance Complaints (Network Calls)	Systems	Network calls are entered into RMS but subject to manual tracking and reporting. This leads to a time consuming process and duplicative efforts to develop the Monthly Summary Report (i.e., Hyle Report) and the Quarterly Board Reporting	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality	Green	Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team. Develop automated reports to track the number, type and outcomes of Network Calls.
Assigned to:			Bob Crow			

RANKING:

__ Group A, Can be addressed Operationally

Select Priority: __ High __ Medium __ Low **X** NA

Select Category: __ Must Do __ Like to Do __ Do Not Need to Do

X Group B, Requires an IT Solution

Select Priority: __ High __ Medium **X** Low __ NA

Select Category: **X** Must Do __ Like to Do __ Do Not Need to Do

NOTES:

-Even though this is a low priority, it is a must do as the program continues to expand.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
33	Security Programs	Systems	Security checklists are completed on paper and reports are manually developed so there is limited electronic evidence of inspections. These would include the cage and vault logs, equipment safety inspections, and quarterly burglar/fire alarm system testing	–Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality –Incomplete or inaccurate information	Yellow	Create an electronic version of the security checklists within the matter management solution that will capture the findings and generate dashboards and reports. This will improve efficiencies while eliminating the manual tracking of findings.
Assigned to:			Bob Crow			

RANKING:

☐ **Group A, Can be addressed Operationally**

Select Priority: ☐ High ☐ Medium ☐ Low ☒ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ **Group B, Requires an IT Solution**

Select Priority: ☐ High ☐ Medium ☒ Low ☐ NA

Select Category: ☒ Must Do ☐ Like to Do ☐ Do Not Need to Do

NOTES:

-Even though this is a low priority, it is a must do as the program continues to expand.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
34	Security Programs	Systems	Tracking and monitoring background checks is a very manual and inefficient process. CSRA currently tracks the requirements, completion, results related to background checks via spreadsheet, with a monthly upload to RMS	<ul style="list-style-type: none"> –Ineffective utilization of time and resources – reduced productivity, reduced efficiency, reduced quality –Incomplete or inaccurate information could result in hiring of excluded individuals 	Yellow	Automate the procedures for tracking, monitoring and reporting on background checks. Evaluate whether there is opportunity for coordination with Human Resources to trigger annual requirements. Consider whether there is a need to evaluate alternate background screening vendors.
Assigned to:			Bob Crow			

RANKING:

☐ **Group A, Can be addressed Operationally**

Select Priority: ☐ High ☐ Medium ☐ Low ☒ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ **Group B, Requires an IT Solution**

Select Priority: ☐ High ☒ Medium ☐ Low ☐ NA

Select Category: ☐ Must Do ☒ Like to Do ☐ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
35	Security Programs	Systems	Security matters are not documented in a centralized location. For example, facility expansions are tracked on the share drive but not recorded in RMS. Other activities such as background checks are tracked both in RMS and locally, resulting in duplication of efforts.	--Lack of visibility to all tasks and activities to manage resource allocation and workload --Ineffective utilization of time and resources -- reduced productivity, reduced efficiency, reduced quality	Green	Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team.
Assigned to:			Bob Crow			

RANKING:

☐ **Group A, Can be addressed Operationally**

Select Priority: ☐ High ☐ Medium ☐ Low ☒ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ **Group B, Requires an IT Solution**

Select Priority: ☒ High ☐ Medium ☐ Low ☐ NA

Select Category: ☒ Must Do ☐ Like to Do ☐ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
36	Business Continuity	Processes	It is unclear whether CSRA has oversight to the remediation efforts and corrective actions taken in response to a business interruption.	--Lack of oversight to ensure risks have been appropriately mitigated	Yellow	Expand the scope of the Crisis Management policy.
Assigned to:			Bob Crow			

RANKING:

X Group A, Can be addressed Operationally

Select Priority: **X** High ___ Medium ___ Low ___ NA

Select Category: **X** Must Do ___ Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low **X** NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES:

-This process is in process.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
37	Business Continuity	Systems	There is no centralized tracking or automated reporting of business interruptions to provide visibility to historical incidents or status of active matters.	--Difficult to track and report on incidents and activities	Green	Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team.
Assigned to:			Bob Crow			

RANKING:

☐ **Group A, Can be addressed Operationally**

Select Priority: ☐ High ☐ Medium ☐ Low ☒ NA

Select Category: ☐ Must Do ☐ Like to Do ☐ Do Not Need to Do

☒ **Group B, Requires an IT Solution**

Select Priority: ☒ High ☐ Medium ☐ Low ☐ NA

Select Category: ☒ Must Do ☐ Like to Do ☐ Do Not Need to Do

NOTES:

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
38	Other CSRA Projects	Systems	There is no centralized tracking of "other" CSRA projects and activities. Some are in RMS or Lawtrac, others are documented on the share drive and assignments are tracked via spreadsheet.	–Lack of visibility to all tasks and activities to manage resource allocation and workload	Green	Implement a customized and centralized matter management solution to address the comprehensive needs of the CSRA team.
Assigned to:			Francine Duncan			

RANKING:

X Group A, Can be addressed Operationally

Select Priority: _X_ High ___ Medium ___ Low ___ NA

Select Category: _X_ Must Do ___ Like to Do ___ Do Not Need to Do

? Group B, Requires an IT Solution – To be determined; see Notes.

Select Priority: ___ High ___ Medium ___ Low ___ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES:

1. Concerning Operational Improvement – CSRA will need to determine its requirements for managing project and functional activity resource allocation and workload, scheduling and reporting requirements. For example - are weekly reports required, does CSRA want to see how much time is spent on projects and functional activities, does CSRA want resource time estimates when planning projects, and should resource allocation hours be included in action plans.
2. Concerning an IT Solution - on projects where CSRA is working with EITS – IT does have a project management process and tool (Clarity) in place to provide visibility to project tasks, and to manage resource allocation and workload. The CSRA project manager has received access, and will be learning how to use the tool and collaborate with IT on managing a project and providing deliverables. Whether this tool can be used on non-IT projects needs to be determined. MS Project is also another tool that is available and has resource management capabilities, and can be utilized for project and functional activity planning. Additional information is needed around CSRA requirements, as well as other enterprise solutions that may be available and how they are being used for resource management and scheduling – e.g., Clarity, Workday, SmartSheet, Rally, MS Project, MS Excel.
3. Based on comments 1 and 2, the Matter Management system would be the central repository for CSRA project documentation – e.g., charters, schedules, requirements documents. After CSRA project management requirements are provided, it would need to be determined whether the Matter Management System can and/or should be enabled to meet those requirements, or if another type of solution is used – e.g., Clarity or another enterprise tool or set of tools. Matter Management could provide links to these. More information is needed around available tools and if associated ABC standards and practices are in place.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
39	Project Management	Processes	Still in the process of defining the project management function within CSRA.	--Difficult to provide oversight without standards and procedures.	Green	Continue to define the project management function as it relates to the CSRA department, including the coordination with IT partners.
Assigned to:			Francine Duncan			

RANKING:

X Group A, Can be addressed Operationally

Select Priority: _X_ High ___ Medium ___ Low ___ NA

Select Category: _X_ Must Do ___ Like to Do ___ Do Not Need to Do

___ Group B, Requires an IT Solution

Select Priority: ___ High ___ Medium ___ Low _X_ NA

Select Category: ___ Must Do ___ Like to Do ___ Do Not Need to Do

NOTES:

- Concerning Operational Improvement – development of the function is in progress. It needs to be determined how oversight will be handled, as it appears that ABC does not have enterprise standards in place nor an enterprise Project or Program Management Office (PMO). To the best of the CSRA project manager's knowledge, the practice of project management is handled by various Project or Program Management Office's (PMO's) throughout the enterprise and project managers within functional areas such as CSRA. (It is suggested that consideration be given by ABC to implementing a Center of Excellence around program and project management in the future, to support best practices throughout the enterprise.)

Standards and procedures can be put in place at the department level for CSRA, as project management practice is fairly consistent throughout ABC, and based on the global standard, the Project Management Institute PMBOK (project management book of knowledge).

- An IT solution is already in place with a defined process. Per comments on ID No. 38, this process can be used for projects that are done in collaboration with IT. For projects that do not include IT, various desktop tools are available for project management and it needs to be determined if elements of the IT process and the tools can be leveraged in the business environment.
- In practice, business project managers usually collaborate with IT and external partner project managers on initiatives, forming "mini-PMO's" on specific efforts.

AmerisourceBergen Corporation
CSRA Process Review – Findings Matrix

ID No.	Affected Area & Activity	Category	Findings & Observations	Gaps & Risks	Potential Business Impact	Recommendations
40	Project Management	Systems	There is no centralized repository for tracking and reporting project documentation, though utilizing SharePoint as an interim solution.	–Lack of visibility to all tasks and activities	Green	Implement a centralized and comprehensive matter management solution such that the CSRA team has access to key project documentation (e.g., project charters and action plans) and visibility to the status of ongoing projects.
Assigned to:			Francine Duncan			

RANKING:

 X Group A, Can be addressed Operationally

Select Priority: X High Medium Low NA

Select Category: X Must Do Like to Do Do Not Need to Do

 X Group B, Requires an IT Solution

Select Priority: High X Medium Low NA

Select Category: Must Do X Like to Do Do Not Need to Do

NOTES:

1. As an interim solution, a SharePoint can be utilized as the centralized repository, and access provided to CSRA. SharePoint is currently utilized by other groups at ABC to house project documentation.
2. As CSRA's objective is to house all documentation in one system, it would be most efficient to maintain project documentation in the Matter Management System. If this capability is not initially implemented, then a link to the SharePoint within the system would be useful.